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May 3, 2002

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

*Re: CC Docket No. 02-33
Notice of Proposed Rulemaking (FCC 02-42)*

Dear Ms. Dortch:

On behalf of West21 Systems, Inc., I am writing to express my support for the comments filed on the above-referenced proceeding by The Wireless Communications Association International, Inc. ("WCA"), and to urge the Commission not to impose Universal Service Fund obligations on smaller license-exempt providers of broadband services.

With only 2 people on our staff, the imposition of the accounting required to process Universal Service Funds would be a huge financial hardship. We have been using the license-exempt bands to provide high-speed Internet access to the churches and non-profit organizations of Asbury Park New Jersey, where there is little or no cable modem or DSL service. We give our customers the ability to use broadband as if they were located in a large metropolitan area..

I wish to emphasize here that we are fully supportive of the goals of universal service – indeed, in effect we are already doing what universal service is designed to promote, albeit without government funding. By the same token, however, we are not an ILEC or a cable MSO, and we simply cannot afford the personnel or administrative resources necessary to ensure USF compliance. Moreover, any diversion of what little staff we have will have a direct and immediate adverse effect on our ability to serve our customers. Our business, in other words, would be put at unnecessary risk, and our customers ultimately would pay the price.

We therefore urge the Commission to take these considerations into account and, at a minimum, not impose USF reporting and contribution obligations on smaller license-exempt providers of broadband service. Thank you.

Very truly yours,

Joseph D'Andrea
Operations Manager